

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re:

David P Spencer

Debtor

Chapter 13

Bankruptcy No.20-12580-AMC

OBJECTION OF CHAPTER 13 TRUSTEE  
TO CONFIRMATION OF PLAN OF DEBTOR

**AND NOW** comes Scott F. Waterman, Esq., Standing Chapter 13 Standing Trustee, to object to confirmation of the chapter 13 plan of the Debtor, because it fails to comply with 11 U.S.C. Sections 1322 and/or 1325 of the Bankruptcy Code, and/or Debtor has failed to provide information, evidence, or corrections to the petition, schedules, statements, or other documents filed by Debtor to enable the standing trustee to evaluate the Plan for confirmation, as follows:

Debtor(s) has/have failed to file an amended plan as directed at the meeting of creditors held under 11 U.S.C. Section 341(a).

The claims and/or claim amounts identified in the Plan are inconsistent with one or more filed proofs of claim.

Schedules I and J indicate that the debtor(s) will not be able to make all payments under the Plan and to comply with the Plan, in violation of 11 U.S.C. Section 1325 (a)(6).

The Plan is underfunded in that the total filed proofs of claim which are to be paid through the Plan exceed the value of the Plan.

**WHEREFORE**, the standing trustee requests that the Court enter an order in the form annexed hereto denying confirmation of the Plan.

Respectfully submitted,

*/s/ Scott F. Waterman*

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Scott F. Waterman, Esquire  
Chapter 13 Standing Trustee